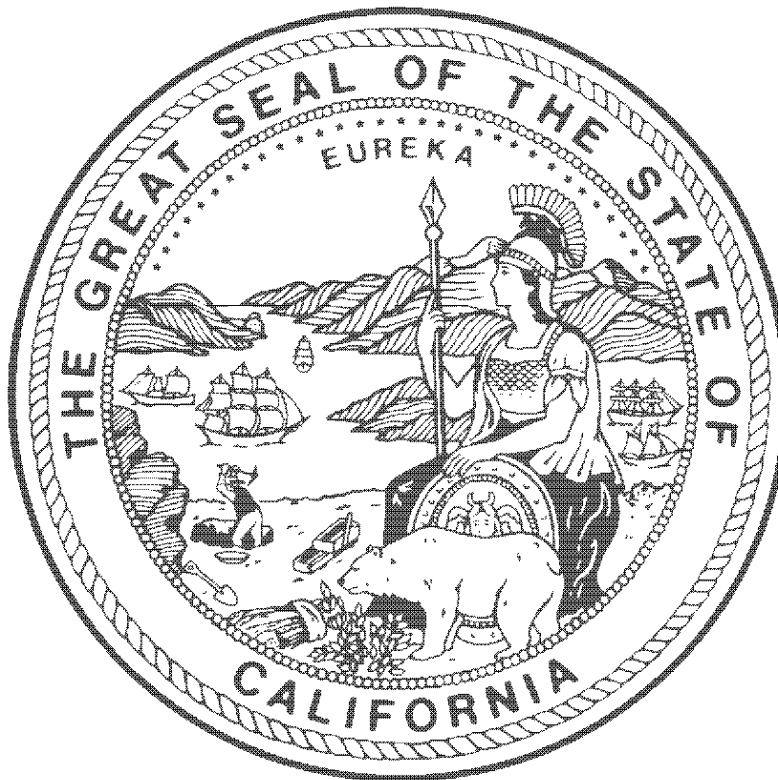


**ANNUAL STATE PLAN UNDER SECTION 403(a)(5) OF
THE TEMPORARY ASSISTANCE FOR NEEDY FAMILIES
BLOCK GRANT WELFARE-TO-WORK**

FORMULA GRANTS



STATE OF CALIFORNIA

For Federal Fiscal Year 1998

PROGRAM ADMINISTRATORS

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INTRODUCTION

California welcomes the opportunity to apply for and receive its formula allocation of Welfare-to-Work (WtW) Grant Program funds as provided for in the Balanced Budget Act of 1997. In August 1997, the state instituted the California Work Opportunity and Responsibility to Kids (CalWORKs) Program. CalWORKs formally implements the federal Temporary Assistance for Needy Families (TANF) program in California starting on January 1, 1998. CalWORKs provides counties maximum flexibility in designing and implementing their TANF programs to meet local needs. The California Department of Social Services (CDSS) issued CalWORKs planning instructions in October 1997, and local governments and County Welfare Departments (CWDs) have begun the process of developing CalWORKs activities in consultation with workforce preparation entities and other local partners.

The state has developed and implemented strategies for assuring the coordination of employment and training resources with welfare reform. California's network of One-Stop Career Centers, for instance, is including CWDs in local planning and policy development, with CWDs in many areas participating in the centers. Job Training Partnership Act (JTPA) programs, operated by California's network of Private Industry Councils (PICs) are also serving more welfare recipients in more innovative ways than ever before.

Consistent with CalWORKs legislation, California's approach to implementation of its WtW Grant Program is one of local determination and accountability. Given the extreme diversity of the state's 58 counties and 52 PICs, there is no one service strategy that could be effectively applied statewide. Rather, each set of local partners will be expected to work together to develop targeting and service strategies that will meet their communities' demographic and workforce needs. To assure accountability, local plans for the WtW Grant Program will be required of the PICs. The PICs will be required to develop these plans in collaboration with CWDs, local government, and other local partners to ensure that they meet the needs of the local area and are consistent with local CalWORKs activities. In addition, PICs will be required to describe in their local plans how they will collaborate with the business community, foundations, and other appropriate entities to leverage resources, create jobs, and identify other opportunities which will assist long term welfare recipients in achieving self sufficiency. The state will provide necessary policy guidance, technical assistance, and oversight for the local programs.

I. WELFARE-TO-WORK PROGRAM DESCRIPTION

A. Program Design:

1. *Describe the state and local targeting strategies to reach the hard-to-employ TANF recipients eligible under WtW and assure that appropriate activities and services are provided to help those participants achieve self-sufficiency.*

In California, the PICs will be responsible for developing targeting strategies to reach hard-to-employ CalWORKs recipients eligible under the WtW Grant Program. The PICs will be required to collaborate with local government officials and CWDs to determine the needs and priorities of the local areas, their targeting strategies, the range of services they will make available, as well as the strategies they will employ to ensure that eligible participants receive the appropriate services. The PICs must also demonstrate successful coordination and consultation with other partners such as One-Stop Career Centers, community colleges, providers of supportive services, transportation and housing agencies, foundations, the business community, and economic development organizations in development and adoption of these strategies.

At the state level, the Employment Development Department (EDD) and the California Department of Social Services have developed a close working relationship which began with the development and planning of the state and local plans and will continue through implementation. Off-site meetings were held with the CWDs and PICs to discuss local coordination and issue resolution. Additionally, the EDD convened a WtW State Partners Work Group to collaborate with the various state entities in the development of this program.

As required in federal law, at least 70 percent of the in-state formula funds must be spent on individuals described under 20 CFR 645.212. These individuals include:

- CalWORKs recipients who have been on aid for 30 months or more, consecutive or cumulative, or who are within 12 months of the state-imposed durational time limits on aid. These recipients will also have to meet at least two of the following requirements:
 - ✓ They failed to complete secondary school or to obtain a certificate of general equivalency, and have low skills in reading or mathematics;
 - ✓ They require substance abuse treatment for employment; and/or
 - ✓ They have poor work histories.
- A non-custodial parent of a minor child whose custodial parent meets the criteria listed above, and
- Individuals who have reached the federal five-year lifetime limit on aid or a state-imposed durational limit.

The PICs may spend up to 30 percent of the in-state formula allocation on non-custodial parents who are not recipients of aid, former CalWORKs recipients who have reached the state-imposed durational limit on aid, and other recipients, such as those who have dropped out of school, had a teenage pregnancy, or those who demonstrate characteristics associated with long-term welfare dependency. In their local plans, the PICs are asked to provide additional characteristics of long-term welfare dependency they intend to use for eligibility purposes.

2. Define and describe state and local strategies regarding:

- a. the employment activities (community service, work experience, job creation through public and private wage subsidies, on-the-job training) that are planned under this grant.***

California will take advantage of all employment activities allowable under the WtW Grant Program. These activities will be conducted in compliance with the Fair Labor Standards Act. The mix of employment activities and services, which each PIC will provide for eligible participants under the WtW Grant Program, will be determined locally. The PICs will collaborate with CWDs, local government, workforce preparation and education entities, community-based organizations, the business community, economic development organizations, and other local partners to determine both the need for and the availability of services.

The WtW activities will be defined consistent with federal law and regulations as well as the State's CalWORKs legislation. This will ensure maximum local coordination with CalWORKs activities. CalWORKs definitions are available for three of the allowable WtW employment activities. Job creation, although not defined under CalWORKs, will be an allowable WtW activity and will be defined locally. State staff will convene a state and local partners work group to identify the need to further refine and clarify these definitions. These WtW employment activities and their definitions are:

Work Experience, consisting of public or private sector work that will help provide basic job skills, enhance existing job skills in a position related to the participant's experience, or provide a needed community service that will lead to employment.

On-the-Job-Training (OJT), in the public or private sector. This may include, but is not limited to grant-based OJT, in which the recipient's cash grant, or a portion thereof, or the aid grant savings resulting from employment, is diverted to the employer as a wage subsidy to partially or wholly offset the payment of wages to the participant.

Community Service. These services must:

- Be performed in the public and private nonprofit sector;
- Provide participants with job skills that can lead to unsubsidized employment; and
- Comply with the anti-displacement provisions contained in state law.

Job Creation, through public or private sector employment wage subsidies. The WtW client draws a salary and is considered to be an employee.

- b. *the utilization of contracts with public and private providers of job readiness, placement and post-placement services; job vouchers for placement, readiness, and post-employment services; job retention, or support services, if not otherwise available to the individual participants receiving WtW services, that are planned under this grant.***

The CalWORKs Program places no restrictions on the ability to contract with public or private entities for the provision of various services. The PICs, the local administering agencies for the WtW Grant Program, have extensive experience in contracting for services and have access to a wide array of service providers in each community. The PICs will be requested to demonstrate how their use and provision of supportive services supplements the local CalWORKs plan and supports local priorities and needs. Job placement services financed through vouchers or contracts with public or private providers will be subject to the one-half payment/six month federal WtW requirement when individuals are placed in permanent unsubsidized employment.

Of the following list of allowable activities, none, except for job readiness, are defined in CalWORKs. State staff will convene a state and local partners work group to identify the need to further refine and clarify these definitions. These activities will be reflected in the local plans. All of these activities, as outlined in the WtW regulations, will be available under California's WtW Grant Program.

Job Readiness Services, through vouchers or contracts with public or private providers. These services will provide the recipient with training to learn job seeking and interviewing skills, to understand employer expectations, and learn skills designed to enhance an individual's capacity to move toward self-sufficiency.

Job Placement into subsidized or unsubsidized employment with a public or private employer, through vouchers or contracts with public or private providers. Job placement includes but is not limited to assessing skills, identifying ranges of occupations available in the local labor market, and developing jobs.

Post-employment Services, including, but not limited to, basic educational skills training, occupational skills training, English-as-a-second-language training, and job mentoring, financed through vouchers or contracts with public or private providers.

If an operating entity is also directly operating a community service program, a work experience program, an on-the-job training program, or a program to create jobs through wage subsidies, then job placement, job readiness, and post-employment activities may be offered by the operating entity as part of these services.

Job Retention and Support Services, if these services are not otherwise readily available. Job retention and support services will include but not be limited to child-care, transportation, mental health, and non-medical substance abuse treatment as necessary to obtain or retain a job.

Individual Development Accounts established by or for an individual to allow the individual to accumulate funds for the following purposes:

- Postsecondary educational expenses paid directly to an eligible educational institution;
- Qualified acquisition costs for a qualified principal residence; and
- Transfer to a business capitalization account, established in a federally insured financial institution.

3. Describe the state and local policy and procedures which will govern implementation of such activities. Include how WtW funds will be used to provide necessary support services (child-care, substance abuse treatment, transportation, etc.) when these services are not otherwise available to the individual participants receiving WtW services.

The state will consult with the PICs, the CWDs, and other partners in determining policy direction and procedures for the WtW program. Policy guidance and procedures will be provided through the use of directives, information bulletins, capacity building activities, and on-site reviews. In developing policy direction, the state will focus on facilitating coordination of the WtW Grant Program with the CalWORKs and JTPA programs, as well as other programs serving welfare recipients.

At the local level, the PICs and CWDs have been engaged in the development of CalWORKs plans, and many have already extended this coordination to initial planning for the WtW Grant Program. Several approaches are planned, ranging from CalWORKs providing all supportive services, with WtW concentrating only on job placement, to a mix of services within each program. The particular mix of activities and implementation strategies, and the coordination of services and providers that will be used within each SDA, will be described in the local plan.

The state will continue to strengthen and build local partnerships through the One-Stop Career Center System which, through its integration of services, can provide improved linkages between the CWDs, the PICs, and other state and local workforce preparation, education, and human service programs. This collaborative process will identify service gaps and local strategies to fill them. When supportive services such as child-care, substance abuse treatment, and transportation are not available from other sources, WtW funds can be used to provide such services based on local agreements among the various stakeholders.

4. *List the performance goals and outcomes the state intends to achieve in serving eligible participants in the WtW program including: (a) placement in unsubsidized jobs; (b) duration of such placement; and, (c) increase in earnings. The performance goals and outcomes should be expressed in measurable, quantifiable terms to the greatest extent possible.*

California's initial WtW Grant Program performance goals for the first year of operation include a placement rate, a follow-up employment rate, and a follow-up increase in earnings goal. These goals are based on the state's historical experience in serving JTPA participants with similar characteristics to the target group for the WtW Grant Program. These are initial targets based on limited data. The state understands that the participant population and the program design for WtW are different than those under the JTPA. The state will continue to refine these goals as the program progresses and tracking systems are developed. These goals may also be modified when the DOL releases detailed guidance on setting program goals and outcomes.

The state has set three goals for the WtW Grant Program. These goals are : to place at least 45 percent of WtW clients into unsubsidized employment; that at least 70 percent of the participants placed into unsubsidized employment should be employed six months after placement; and that the average wage at six month follow-up should increase by 10 percent over the average wage at placement for participants who remain employed for six months. These goals will be used as benchmarks to assist the state in providing technical assistance to local areas which may require it, although the state recognizes that local performance goals may differ somewhat from those in the state plan. The state will require the PICs

to describe in their local plans their local performance goals for placements, job retention, and increased earnings at follow-up for the WtW Grant Program.

California will report WtW activities and outcomes to the DOL on a quarterly basis. Additionally, California, through Senate Bill (SB) 645 (Chapter 771, Statutes of 1995), is instituting an education and job training report card system to assess the accomplishments of the state's workforce preparation programs. The SB 645 program gathers information from various state data bases, including the Unemployment Insurance Base Wage File system, in order to report program outcomes including:

- Employment rate;
- Earnings before and after participation;
- Rate of change in status from tax receiver to tax payer; and
- Length of employment retention.

The state will consider incorporating the WtW Grant Program into the mix of programs currently participating in this system. However, a full year of data on first year participants would not be available until June 2000.

5. *Provide a description of how the program will be implemented by PICs across the state, including the roles and responsibilities of the state WtW administrative agency and the TANF agency; a list of the substate areas and the local entities responsible for program administration; and, the program's implementation target dates.*

California will designate the 52 PICs as local administrative entities, unless a specific PIC refuses to accept the grant, or the PIC Chair, the Chief Local Elected Official, and the County Board(s) of Supervisors within the SDA are unable to reach agreement as to the administration of the program. Should such agreement not be reached, this may indicate potential coordination issues that can effect the efficiency and effectiveness of the program. The state will work with the local area to resolve the problem. In the absence of a resolution, California may seek a specific waiver for an alternate local administrative entity through the plan modification process. Attachment B contains a list of the 52 SDAs and their 52 PICs.

Each SDA's program design will be based on local needs, as determined by the PIC in collaboration with the CWD, local government, and other local partners. Local plans, to be submitted to the state, will describe the local program design and implementation strategies and will include assurances of local collaboration between the PIC and the CWD, as well as demonstrations of collaboration with other local agencies including the community colleges, education, transportation, housing, the business community, foundations, child-care organizations, economic development organizations, and other appropriate entities. The plans will include

the signature of the PIC Chair and the Chief Local Elected Official and Board action by the County Board(s) of Supervisors within the SDA. It is expected that the local plans will be developed jointly between the PIC and the CWD. The County Board of Supervisors will consider the input of the CWD when Board action is taken.

The EDD is the state administrative agency for the WtW Grant Program. The EDD also provides state-level administration for the JTPA program and has systems in place for issuing policy guidance, collecting program and participant data, and administering fiscal and monitoring procedures. The EDD will continue to work closely with the CDSS, the CalWORKs agency for California. In addition, the EDD will provide policy guidance to PICs for collaboration and coordination with CWDs in their administration of the WtW Grant Program. The CDSS will provide similar guidance to the CWDs, which administer CalWORKs at the local level.

Please refer to Section C for more detailed information on the state-level collaborative process.

California's implementation date is targeted for late March, subject to receipt of a Notice of Obligational Authority from the DOL. Funds will be made available to local PICs within 30 days of receipt of a plan that meets the legal requirements of federal law and regulations, is consistent with the state plan, and demonstrates the required level of coordination through signatures of the PIC Chair and the Chief Local Elected Official and Board action by the County Board(s) of Supervisors within the SDA.

6. *Identify state policies and procedures developed in coordination with PICs regarding: (a) identification and referral of participants; and, (b) assessment and case management, if any. Include a description of the coordination efforts that the local TANF and administrative agency will undertake in this process, including the role these local agencies will play in providing assessment and case management to qualified participants.*

The WtW Grant Program will be designed and operated locally, based on local needs and resources. The state will provide overall guidance, technical assistance, and oversight. Determining specific program elements, such as the identification and referral of CalWORKs clients, or the roles of local agencies in providing assessment and case management, is a local responsibility that will be developed by the PICs in cooperation with the local CWDs and addressed in the local plan. The local mechanisms developed will be consistent with the requirements set forth under 20 CFR 645.214.

In some areas of the state, the local JTPA and CalWORKs programs are administered by the same county agency. Some have developed, or are in the process of developing, shared data systems. This will expedite the case

management activities for the WtW Grant Program. In other counties, a Memorandum of Understanding is in place between the PIC and the CWD, or it is currently being negotiated, delineating their respective roles with regard to serving welfare recipients.

The PICs and the CWDs will be able to choose from existing assessment models or negotiate their own, unique system for referrals, assessment, and case management. The PICS will not be required to complete a new assessment or individual responsibility plan for WtW participants when an assessment and plan has been provided by the CWD under the CalWORKs program.

The PICs will be required to describe in their local plans how they will ensure that CalWORKs and WtW activities are coordinated and, specifically, which agencies will be responsible for assessment and case management of WtW clients.

7. *Describe the state's procedures for conducting monitoring and oversight of substate areas to ensure adequate fiscal controls and achievement of quality program outcomes for WtW participants. The description should include, but not be limited to:*

a. mechanisms for monitoring expenditures of match requirements, allowable activities, and targeting of eligible participants;

The EDD's Compliance Review Division (CRD) currently conducts ongoing program and fiscal monitoring reviews of California's JTPA programs to ensure compliance and fiscal integrity in accordance with applicable federal and state laws, regulations, and policies. The Monitoring Section within the CRD will also be responsible for the monitoring of all PICs, or alternate administrative entities if any are designated for the WtW Grant Program.

The scope of monitoring reviews for the WtW Grant Program will be outlined in the WtW Grant Program monitoring guides for various areas of operation. The WtW monitoring guides will include applicable federal and state compliance requirements and provide a structured, uniform approach for reviewing and identifying noncompliance issues and suggestions for program improvement.

Monitoring reviews will be conducted in accordance with established monitoring protocols that require:

- Advance scheduling and notification of on-site visits;
- Advance sharing of monitoring guides;
- Formal entrance and exit conferences;
- Issuance of draft and final reports; and
- On-site follow-up to ensure that agreed upon corrective action to resolve compliance issues are successfully implemented.

Furthermore, monitoring protocols will require coordination with the assigned program manager in the Workforce Development Branch, so that prompt technical assistance is provided regarding required corrective action to ensure program improvement and compliance with federal and state law.

b. frequency of monitoring;

The frequency of the monitoring reviews will be determined on a risk assessment basis.

c. use of technical assistance to ensure compliance with the Act and as a tool for corrective action and program improvement.

The state will provide technical assistance to the PICs by use of directives, information bulletins, capacity building activities, and on-site reviews performed by the program managers. These efforts will emphasize compliance with the Act and regulations, joint collaboration between local partners, and improved services to and employment of long term welfare recipients. Any problems identified in monitoring visits will be followed up with prompt technical assistance and local corrective action plans.

8. Describe the strategies of the state and the PICs to prevent duplication of services and promote coordination among WtW, TANF, JTPA, one-stop centers/employment service and other employment and training systems throughout the state.

Coordinating the design and delivery of services to WtW participants, in conjunction with those available to other workforce preparation customers including CalWORKs recipients, will ensure that the resources and services of the entire system are available to WtW participants. The EDD will work with SDA directors, county welfare directors, and other key stakeholders to provide public forums for information sharing on successful practices and coordination efforts. At the state level, the WtW State Partners Work Group, consisting of a number of state entities provided advice in preparing the state WtW Grant Program plan, and will continue to meet to facilitate state and local coordination, issue resolution, and joint capacity building to each organization's local constituencies.

The EDD and CDSS have formed a Coordination Committee which continues to meet to discuss each Department's issues related to CalWORKs, WtW, JTPA, One-Stop, and other related programs. This will assure that issues are raised and can be resolved early in the implementation process.

At the local level, California has made significant investment in and progress toward developing a statewide One-Stop Career Center System. The CDSS and the CWDs have been represented on the One-Stop Career Center System Task Force since its inception. The Task Force is responsible for the design and implementation of local One-Stop Career Center systems in California. All local One-Stop Career Center grants awarded to date have included CWDs as partners in system implementation. The State Job Training Coordinating Council (SJTCC) and One-Stop Career Center System Task Force have voted to recommend that CWDs be mandatory partners in One-Stop Implementation Grant proposals for the second year.

Other strategies which are being used to prevent duplication of services and promote coordination include:

- Minimizing duplicative employer contacts by multiple agencies for job openings.

Recently enacted, Assembly Bill (AB) 67 (Chapter 606, Statutes of 1997) requires the EDD to convene local groups representing Job Service field offices, CWDs, SDAs, and community colleges to develop a local plan on how these entities will regularly coordinate employer outreach activities and the solicitation of entry-level and other job listings.

- Developing expanded collaborative local/regional networks that encourage the participation of a greater range of public and private sector service providers, stakeholders, and the business community.

Recent state law, AB 1542 (Chapter 270, Statutes of 1997), also requires the development of an integrated state workforce development plan for service delivery, resource investment, and performance measures. The plan will be developed with substantial local input so that education, workforce preparation, and economic development services can be delivered to clients in a more responsive, integrated, and effective manner. Five million dollars will be made available each year, for three years, to fund collaborative efforts which promote effective service delivery through integration of existing partnerships.

Additionally, under AB 1542, the EDD is required to establish a council of retired and former corporate executives which would provide ongoing advice and assistance to the EDD in recruiting private employers to hire welfare recipients.

9. Describe the strategies of the state and PICs to promote and encourage coordination with the State Department of Transportation, MPOs, transit operators and other transportation providers to help ensure that the transportation needs of those moving from welfare-to-work are met.

The CalTrans has been a member of the WtW State Partners Work Group, and has discussed the resources and assistance services which its local affiliate agencies could contribute to the planning and decision making processes. As with the other state partners, CalTrans will work with and encourage its local affiliates to work closely with, the PICs and the CWDs to identify and develop strategies for closing gaps in local transportation systems and using transportation to support successful job retention of WtW participants.

At the local level, the CWDs' CalWORKs plans address transportation needs of recipients and how those needs will be met. In many areas, work groups have already been established, including the PICs, the CWDs, local transportation agencies, and other service providers, to address transportation issues. The PICs will be required to describe local efforts to address the transportation needs of WtW participants in their local WtW plans.

10. Describe the strategies of the state and PICs to promote and encourage coordination with the State Housing Finance Agencies, public and assisted housing providers and agencies and other community based organizations, and the public and private health, mental health and service agencies, vocational rehabilitation and related agencies.

The State Department of Housing and Community Development, as a member of the WtW State Partners Work Group, has identified local programs that address housing needs of low income families and will encourage its local affiliates to collaborate with the PICs, the CWDs, and other local agencies in planning for meeting the needs of WtW participants.

The PICs are part of the local CalWORKs planning process and are in the process of developing linkages with local housing agencies and other social service providers. Each PIC, in its local WtW plan, will be asked to describe its coordination with various programs and providers and their respective roles and responsibilities. This will include how WtW participants will access housing assistance, mental health services, substance abuse treatment, and vocational rehabilitation services. Many of the local One-Stop Career Centers already provide access to on-site services.

B. Within State Distribution of Funds:

Describe the formula factors used by the state to allocate not less than 85 percent of the amount of the grant funds among the PICs in the state as well as the timeline for the allocation to PICs. Include the weights assigned to each factor and the allocation the state will provide to each substate area.

California will distribute 85 percent of the state's WtW funds to the 52 Service Delivery Areas based on the following formula:

- | | |
|--|------------|
| • Relative number by which the population in the area below poverty exceeds 7.5 percent of the total population. | 55 percent |
| • Relative number of adults residing in the areas receiving assistance under TANF or the predecessor program for at least 30 months. | 30 percent |
| • Relative number of unemployed individuals residing in the area. | 15 percent |

This allocation formula ensures that all SDAs in California will receive the \$100,000 minimum threshold for funding, and focuses funding on rural areas with high unemployment and inner city areas with high poverty and difficult employment issues. The chart on the following page displays the Fiscal Year 1997-98 allocations to SDAs.

SDA NAME	SDA ALLOCATION
ALAMEDA	\$1,520,686
ANAHEIM	\$1,189,382
BUTTE	\$1,264,767
CARSON/LOMITA/TORRANCE	\$525,315
CONTRA COSTA	\$1,114,932
FOOTHILL	\$1,248,269
FRESNO	\$7,454,107
GOLDEN SIERRA	\$812,364
HUMBOLDT	\$698,513
IMPERIAL	\$1,600,430
KERN/INYO/MONO	\$4,567,951
KINGS	\$756,657
LONG BEACH	\$3,792,464
LOS ANGELES CITY	\$32,080,060
LOS ANGELES COUNTY	\$22,153,146
MADERA	\$759,106
MARIN	\$185,201
MENDOCINO	\$465,475
MERCED	\$1,888,102
MONTEREY	\$1,629,955
MOTHER LODE	\$443,480
NAPA	\$209,898
NORTHERN RURAL TRAINING AND EMPLOYMENT CONSORTIUM	\$1,179,503
NORTH CENTRAL COUNTIES	\$1,620,726
NORTH SANTA CLARA VALLEY JOB TRAINING CONSORTIUM	\$340,448
OAKLAND	\$3,013,624
ORANGE	\$3,710,069
RICHMOND	\$659,692
RIVERSIDE	\$5,854,845
SACRAMENTO	\$6,387,277
SAN BENITO	\$182,595
SAN BERNARDINO CITY	\$2,143,859
SAN BERNARDINO COUNTY	\$6,968,031
SAN DIEGO	\$11,837,010
SAN FRANCISCO	\$2,367,832
SAN JOAQUIN	\$3,455,691
SAN LUIS OBISPO	\$628,217
SAN MATEO	\$524,928
SANTA ANA	\$2,357,717
SANTA BARBARA	\$1,315,774
SANTA CLARA	\$2,774,645
SANTA CRUZ	\$872,717
SOUTHEAST LOS ANGELES COUNTY	\$1,414,751
SHASTA	\$924,260
SOLANO	\$986,910
SONOMA	\$940,612
SOUTH BAY	\$2,136,470
STANISLAUS	\$2,659,779
TULARE	\$3,603,117
VENTURA	\$1,818,111
VERDUGO	\$2,080,540
YOLO	\$734,648
TOTAL	\$161,854,660

C. Coordination and Consultation:

Describe the approach, including process and timing, used to obtain and take into account consultation and coordination with substate entities such as public, private and non-profit organizations, in the development of the state plan. Include either a summary description of the comments received, along with the names of the individuals or entities who commented, or include copies of the actual comments received as an attachment to the plan.

California used its existing collaborative infrastructure to ensure optimal consultation and coordination with both state and local partners in developing and reviewing the state plan for the WtW Grant Program. With the passage of the Balanced Budget Act of 1997 and notification to the states of the WtW Grant Program, the California Health and Welfare Agency convened a work group consisting of EDD and CDSS managers and staff to analyze the legislation, identify issues, make recommendations to the Governor in policy areas that required his direction, and assign responsibilities for developing the necessary state planning processes.

Meetings were conducted, as a part of the effort, with CWD Directors and SDA Administrators, involving them in the early stages of program development. During the development of the state plan and the local planning guidelines, SDA Administrators were consulted to provide input and clarification on local programs, issues, and practices.

The EDD convened a WtW State Partners Work Group. One of the roles of this work group is to provide input and direction in the planning process. That group consists of:

- The EDD;
- The Business, Transportation and Housing Agency;
- The CDSS;
- The CalTrans;
- The California Department of Education;
- The Department of Mental Health;
- The Chancellor's Office of the California Community Colleges;
- The Trade and Commerce Agency;
- The Employment Training Panel;
- The Department of Alcohol and Drug Programs;
- The Department of Community Services and Development;
- The Department of Housing and Community Development; and
- The Department of Rehabilitation.

The Governor directed the EDD to conduct public hearings under the auspices of the SJTCC on the proposed WtW Grant Program state plan. Five hearings were held throughout the state in January and February to accept public comment on the plan from state and substate entities, including public and non-profit organizations. Several changes

were made to the state plan as a result of comments received in those hearings. Attachment C contains a summary of comments received through the public review process.

D. Expenditure of Funds:

1. *Describe the process the state will use to maintain administrative costs at the 15 percent limit.*

With the allocation of the 85 percent funds, the state will limit substate areas to an administrative expenditure of no more than 13 percent of the formula allocation. The remainder of the allowable administrative cap will be retained by the state for state-level administration and administrative costs associated with projects funded by the Governor through the 15 percent discretionary funds.

The cost limitations will be monitored through the quarterly fiscal reporting system. The state will use the existing JTPA fiscal reporting and tracking system, known as the Job Training Automation (JTA) system, with necessary modifications. The EDD's Job Training Partnership Division (JTPD) is responsible for state-level administration of the JTPA Program in California. Its Financial Management Unit, in collaboration with the EDD's Fiscal Programs Division (FPD), will establish a system to ensure that administrative and other cost limits are not exceeded. As the local WtW administrative entities report quarterly fiscal data through the state's JTA system, the FPD will track these expenditures to ensure that they are in compliance with budgeted amounts. Should discrepancies be noted, JTPD will work with the local entities to identify problem areas and prevent excessive administrative costs.

2. *Describe how the PIC and any alternate agency designated by the Governor, will coordinate the expenditure of any funds provided for the WtW program between TANF and WtW.*

The state will require each PIC to include in its local plan a description of how the PICs and CWDs will coordinate to assure that WtW expenditures support CalWORKs (TANF) expenditures. The County Board(s) of Supervisors will be asked to sign the PICs' plans after Board action and certify that the local planning processes for fund expenditures support local CalWORKs activities. A variety of methods will be used locally, including the use of the local One-Stop Career Center systems, to build links between CWD and PIC management information systems.

E. Application for Waiver:

California will not request any waivers at this time. The state reserves the right to request waivers at a later date through a plan modification process. A waiver may be requested if a PIC refuses to accept the grant or the PIC Chair, the Chief Local Elected Official, and the County Board(s) of Supervisors within the SDA are unable to reach agreement as to the administration of the program. Should such agreement not be reached, this may indicate potential coordination issues that can effect the efficiency and effectiveness of the program. The state will work with the local area to resolve the problem before submitting a waiver request.

II. DESCRIPTION OF 15 PERCENT PROJECTS TO HELP LONG-TERM RECIPIENTS OF ASSISTANCE ENTER UNSUBSIDIZED JOBS

Describe the state's plans for the expenditure, uses and goals of the 15 percent funds. These funds may be distributed to public, private non-profit and private for profit entities, including PICs, governmental entities, community based organizations, and community development corporations.

The state will distribute the 15 percent funds on an application or request for proposal basis to projects that will help long-term recipients of assistance enter unsubsidized jobs. In the future, special consideration will be given to programs that take into account the needs of rural areas, leverage resources, and demonstrate a coordinated approach to services. The Governor may give consideration to statewide projects, local employment-related programs, and innovative new programs for job creation. Applications for state and local projects through this funding must be provided to the PIC and the CWD for review and comment. These projects will be operated in accordance with the regulatory provisions applicable to the 85 percent funds and are subject to the 70/30 percent targeting provisions of the WtW program.

III. ESTIMATE OF MATCHING FUNDS:

1. Include an estimate of the amount of matching expenditures the state expects to make during the fiscal year.

California will provide \$95 million to meet the 1997-98 required state match for the federal grants.

2. Include the process by which these expenditures will be monitored and reported quarterly to ensure the state meets its projected match.

The state will monitor the use of funds for allowable activities and eligible participants, management of funds, and the accuracy of data collected in management information systems used to report expenditure of funds. The state will report quarterly, in accordance with applicable federal and state laws, regulations, and policies.

IV. FUNDING:

The state should submit an estimate of expenditures of WtW formula grant funds for each quarter of the fiscal year by percentage or dollar amount.

Estimate of expenditures of Federal Fiscal Year (FFY) 98 WtW formula grant funds cumulative by quarter over the three year life of the funds:

FFY 1997-98:

<u>3/98</u>	<u>6/98</u>	<u>9/98</u>
2%	8%	15%

FFY 1998-99:

<u>12/98</u>	<u>3/99</u>	<u>6/99</u>	<u>9/99</u>
40%	60%	75%	85%

FFY 1999-2000:

<u>12/99</u>	<u>3/00</u>	<u>6/00</u>	<u>9/00</u>
95%	99%	99%	100%

The general assumptions used to determine these percentages of expenditure are:

- That the program will take two or three quarters to build due to factors such as staffing, program design, identification of providers, and contracts negotiations; and
- Expenditures for the first year of funds will peak during the second year as the program becomes fully operational.

V. ASSURANCES:

See attachment A.

VI. SIGNATURE

ATTACHMENTS TO WELFARE-TO-WORK STATE PLAN

- A. Assurances
- B. List of PICs and SDAs
- C. Summary of Oral and Written Testimony/Comments

ASSURANCES

The State of California assures to the following requirements under Title IV-A of the Social Security Act.

PROGRAM ADMINISTRATION/ACTIVITIES

1. California is an eligible state, pursuant to Section 402(a) for the fiscal year.
2. California assures that qualified state expenditures (within the meaning of Section 409(a)(7)) for the fiscal year will not be less than the applicable percentage of historic state expenditures (within the meaning of Section 409(a)(7)) with respect to the fiscal year.
3. California has consulted and coordinated with the appropriate entities in the substate areas regarding the plan and the design of WtW services in the state.
4. California will make available to the public a summary of the WtW plan.
5. California has agreed to negotiate in good faith with the Secretary of Health and Human Services with respect to the substance and funding of any evaluation under Section 413(j) and to cooperate with the conduct of such an evaluation.
6. California shall not use any part of these grant funds, nor any part of state expenditures made to match the funds, to fulfill any obligation of any state, political subdivision, or Private Industry Council to contribute funds under Sections 403(b) or 418 or any other provision of the Social Security Act or other federal law.
7. California will return to the Secretary of Labor any part of the WtW funds that are not expended within 3 years after the date the funds are so provided.
8. California's WtW program will be conducted in accordance with the WtW legislation, regulatory provisions, future written guidance provided by the Department, and all other applicable federal and state laws.
9. California will apply the TANF law and regulations to the operation of the WtW program, unless otherwise specified by the Department or defined in Section 403(a)(5) or the applicable WtW regulations.

10. California assures that services under the WtW grant are provided to eligible participants only.
11. California will maintain and submit accurate, complete and timely participant and financial records reports, as specified by the Secretary of Labor and the Secretary of Health and Human Services.
12. California will establish a mechanism to exchange information and coordinate the WtW program operated by the state and PICs with other programs available that will assist in providing welfare recipients employment.
13. California shall adhere to the certifications required under TANF and will meet the TANF maintenance of effort requirements.
14. California will comply with the uniform fiscal and administrative requirements of OMB Circular A-102 as codified for DOL at 29 CFR Part 97.
15. California will follow the audit requirements of The Single Audit Act of 1984 and OMB Circular A-133.
16. California will follow the allowable cost /cost principles of OMB Circular A-87.

WORKER PROTECTIONS

1. California will establish policies to enforce the provisions regarding nondisplacement in work activities under a program operated with funds provided under WtW.
2. California assures that the Health and Safety standards established under federal and state law otherwise applicable to working conditions of employees shall be equally applicable to working conditions of other participants engaged in a work activity under a program operated with funds provided under WtW.
3. California will enforce the provision that an individual may not be discriminated against by reason of gender with respect to participation in work activities under a program operated with funds provided under WtW.
4. California shall establish and maintain procedures for grievances or complaints from participants and employees under the WtW program.

The procedures established will be consistent with the requirements of Section 403(a)(5)(J)(iv).

5. California shall establish and enforce standards and procedures to ensure against nepotism, conflicts of interest among individuals responsible for the administration and supervision of the state WtW program, kickbacks, and the use of political patronage.
6. California will comply with the nondiscrimination provisions of the laws enumerated at Section 408(d), with respect to participation in work activities engaged in under the WtW program.

Governor or Authorized Signatory:

RAY REMY
Director, Employment Development Department

Date

SDA/PIC LISTINGS

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Welfare-to-Work Grant Program Summary of Oral and Written Testimony/Comments

ATTACHMENT C

SOURCE	ISSUE	COMMENTS
Private Industry Councils	Administrative Cap	<ul style="list-style-type: none"> Allocate 15% administrative costs at local level since first year will be mostly administrative work (12) Full 15% authority can be used by PICs if state uses general fund match dollars for state level administration (3) Need to consider this is a new program (2) <p>Recommendations:</p> <ul style="list-style-type: none"> Use of matching funds for state administration has been discussed with CSAC and CWDA who concur. Might have to go through budget process.
	Matching Funds	<ul style="list-style-type: none"> Need more detail regarding utilization of matching funds Need policy direction that will ensure resources are clearly invested and support WtW activities
	Allocation Formula	<ul style="list-style-type: none"> Alameda supports allocation formula San Francisco expressed concern about differences in allocated amounts between EDD and LAO <p>Recommendations:</p> <ul style="list-style-type: none"> Future funding should retain a minimum level of \$100,000 to each SDA LA PICs recommend revising state plan to allocate no less than 2/3 of total funds to SDAs based on the number of poor persons in excess of 7.5 percent of the SDA's total population
	Performance Goals	<ul style="list-style-type: none"> Goals not realistic; too ambitious (14) Want more flexibility depending on local economy and demographics (10) Performance goals are questioned on the fact that however they were attained, they were not based upon hardest-to-serve; Do not use JTPA measures (7) Average wage does not consider local economic industry nor availability of jobs (2) Adult follow-up rate has been 40% under JTPA system (2) 13 weeks is inadequate duration to evaluate program for 53 percent goal Federal guidelines simply require state site a goal not that it set these goals at levels mentioned in draft state plan Need to consider fundamental shift in service delivery Experience in transitioning agricultural employees into year-round employment demonstrates that these programs must be constantly reevaluated and readjusted to make them work \$281 after 13 weeks does not consider huge variances among counties WtW funds are not JTPA funds although we are dealing with many of the same people Using JTPA approach to measuring placements, retention and wages at retention is inappropriate since money may also be used to support other services, e.g., alternative child care arrangements, transportation, services to support retention Define concisely, keep simple, unambiguous and understandable. Goals will stifle flexibility and creativity

SOURCE	ISSUE	COMMENTS
Private Industry Council	Performance Goals (continued)	<ul style="list-style-type: none"> If performance goals were established from JTPA outcomes using the same welfare populations i.e., long-term, no high school diploma, etc., then these performance goals are all right. However, if they were devised using different, perhaps higher functioning welfare populations, then the performance goals should be adjusted. It appears that the CWDs want WtW placements to meet requirements of TANF. For example, they want job placements for specific numbers of weekly hours. This seems to make the assumption that the WtW participants will be staying on welfare. Good that these are goals, not standards Fears that goals will be codified into law <p>Recommendations:</p> <ul style="list-style-type: none"> Utilize SB 645 System (5) Form work group to establish realistic goals (3) Look at JTPA experience with caveat that JTPA provides substantial skills building first in contrast to work first strategy 50% is better than 65% Design measures and benchmarks to evaluate this program based on CWDs who ran JTPA pilot for the last year Goal should be developed by formula that takes into account particular aspects of a locality
	Eligible Population	<ul style="list-style-type: none"> How do we identify non-custodial parents legally? Significant barriers exist among WtW population WtW placements will be mostly low paid After first tier of CalWORKs, we will be left with only the hardest to serve; second tier will need training, child care, and transportation to place Welfare population is not a new population from JTPA; only a new challenge Bulk of California's TANF population resides in LA county <p>Recommendations:</p> <ul style="list-style-type: none"> State plan should be revised to clarify that non-custodial parents of children on TANF are eligible for the 70 percent of funds which must be targeted at hard to employ individuals (6) Strike "within 12 months of lifetime limit on aid" from page 2; Won't see these people until after four years
	Allowable Activities	<ul style="list-style-type: none"> Use of vouchers or contracts: does this mean that SDAs cannot deliver job readiness, job placement, post-employment, job retention and support services itself through the One-Stop Center? So we have to subcontract or voucher out all services? If so, we object. (7) Leaving definitions to locals will result in many different definitions of terms which could affect evaluation across areas. Need consistent statewide definitions (3) To much emphasis on placement Keep services open to all job seekers and in collaboration with other employment and training entities. Match definitions already in use, JTPA, vocational education, community colleges The state plan should have as much familiarity to JTPA as possible. This will make it easier for the PICs, who will be administering the program. Use JTPA definitions where appropriate.

SOURCE	ISSUE	COMMENTS
Private Industry Council	Allowable Activities (continued)	<ul style="list-style-type: none"> • There should be clarification on definitions mentioned in the state plan. For example, the plan's definition of job creation seems to be public service employment. If this is PSE, it should be so stated • Can't tell if plan allows PICs to run program themselves, particularly in small counties • Some definitions are undefined or are significantly different from JTPA • Need strong electronic case management system • Defining activities is a new challenge • Transportation is a crucial issue for San Bernardino, as is education, weak labor force attachment, and reaching the eligible population • Definitions may trigger audits • If legislature did not require definitions why does the state plan do it? • State should not define job placement, OJT; let these be defined locally through PIC and CWD collaboration <p>Recommendations:</p> <ul style="list-style-type: none"> • Provide strong guidelines to lift confusion with definitions among local partners • Look at implementing broader database that goes beyond WtW to other systems like JTPA • Need to concentrate on building bridges between systems • All database applications for WtW programs should be developed with the One-Stop/PBA system
	Coordination	<ul style="list-style-type: none"> • Collaborative process should have preceded writing the plan. (2) • Data sharing big issue locally (2) • To make everything work cohesively, we need collaboration (2) • Important to link WtW activities with CalWORKs (2) • Childcare and transportation have been coordinated with the CWD and subcommittees are currently working on these areas (Merced PIC) • Local Chambers of Commerce are getting involved in the issue of childcare • In transportation and childcare, how will our local partners be counted? • Need stronger language requiring PIC and CWD to work together • Plan does not need any stronger language regarding collaboration between PIC and CWD. Plan states at 5 or 6 different places that coordination is required. This is enough direction. • Having two sources of local money: TANF, and WtW block grant requires coordination; Pay close attention to CWDA and CWA for help in coordinating • Concern about linking referral services from CWD to WtW program without requiring the CWDs to collaborate with PICs • Not sure how Council of Retired and Former Corporate Executives fits into coordination and consultation • "Demonstration of collaboration" may need more defining in state plan • On page 10 include California Workforce Association as a collaborative body • Joint integration system between EDD, DSS, and local DPSS in LA county is real complex <p>Recommendations:</p> <ul style="list-style-type: none"> • Include language that authorizes CWD to share information and data with PICs to eliminate duplication

SOURCE	ISSUE	COMMENTS
Private Industry Council	Coordination (continued)	<ul style="list-style-type: none"> State should establish work groups for policy discussion and determination for ongoing planning over next 3 years Need to convene work group to coordinate state and local strategies State needs to encourage entities to come to PICs very early in planning/coordination process so as JTPA and WtW programs will integrate into one service delivery system
	Discretionary Funds	<ul style="list-style-type: none"> Projects need to be more clearly defined and described Need clarification on process for allocating funds and selection of applications Language leaves open possibility of bypassing local PICs in the competitive grant process Need collaborative process between SDAs, PICs, and CWDs in this process Should require PIC sign-off in process Include language in state plan that for any application that goes to Governor for his competitive grants have signature of PIC, CLEO and CWDs Competitive grant should operate same way as formula grant
	Local Signatures	<ul style="list-style-type: none"> PIC, CWD and CLEO should be signatories on joint resolution with board of supervisors signing off on plan. (2) It is inappropriate to require County Welfare Director (CWD) sign off on local plan. Board of Supervisors is correct place for sign off. Wants PICs to get experience in administering WtW Pleased with three way sign-off system, but may use some streamlining If funds go out around late March, it would be reasonable to expect signatures by May or June
	Local Plans	<ul style="list-style-type: none"> Timeline for development and approval of local plans to short; unrealistic (2) Allocation dependent on state's review/approval of local plan is inconsistent with federal law which requires that funding be allocated within 30 days Joint resolution process could hold things up State plan should express the intent that plans are to be coordinated at the local level, but the flow of money would not be delayed if signatures are held up Need to encourage opportunities for public forum at the local level If local plan are not eliminated, State plan should authorize PICs to obligate FFY 1998 WtW funds by 9/30/98 even if local plan has not yet been submitted <p>Recommendation:</p> <ul style="list-style-type: none"> To be consistent with federal regulations, state plan should drop local plan requirement (6) In lieu of a local plan, PICs should be required to sign assurances to meet federal requirements and later report how they have met those requirements (6) State plan should provide that it will allocate funds to PICs within 30 days of receiving its WtW allotment (7)
	Other Comments	<ul style="list-style-type: none"> Allocate 100% funds to PIC (7) Concern is that state plan could result in entire loss of FFY 1998 WtW formula grant funds (6) Draft plan makes virtually impossible for PICs to obligate all FFY 1998 WtW funds by 9/30/98 (6) State plan violates federal law by allocating only 83 percent of total WtW formula grant to PICs (6) Commend state on local flexibility and latitude (3) Transportation, education, and child care are all major problems for Fresno Waiver of allocation to PICs - second waiver authority requiring agreement between local signatories conflicts with federal law and regulation.

SOURCE	ISSUE	COMMENTS
Private Industry Council	Other Comments (continued)	<ul style="list-style-type: none"> Do plan and planning guidelines apply only to fed money or to both fed money and state match? Should be both sources of funds to ensure consistency for planning and collaboration. Should be one planning process to ensure integrated planning at the local level. Don't want to see another plan for matching funds. Policy decisions need to be made through collaborative process Keep in mind how this plan can/will complement regional One-Stop planning, does it encourage another employment and training delivery system to be set up at the local level. Use training systems already in place (ETN and capacity building unit). Business community is not compelled by mere social conscience to bring in welfare recipients unless we can show them a benefit to their bottom line Need a further defined cost allocation system for sharing program integration costs If state matching funds are allocated to CWDs, the CWDs should be required to coordinate the use of WtW funds with the SDAs Recipients of DOL competitive grant funds should be required to work with PICs and CWD to ensure consistency with WtW and CalWORKs plans prior to submitting their DOL applications
California Workforce Association	Administrative Cap	<ul style="list-style-type: none"> Change the Plan to indicate that the full 15 percent administrative cap will be passed to the PICs
	Matching Funds	<ul style="list-style-type: none"> Add a statement clarifying that the State and local plans refer to both the federal WtW funding and the state match and that both PIC and CWD activities should be covered Include in the plan a provision of sufficient funding for state administration of the program and clarify that the source of this funding will be from the state match
	Allocation Formula	<ul style="list-style-type: none"> Appreciate the effort to ensure a minimum of \$100,000 per SDA
	Performance Goals	<ul style="list-style-type: none"> Use the SB 645 Employment and Training Report card system to first benchmark performance and then measure success Establish a state-local work group with PICs/EDD and CWDs/DSS to recommend performance measurement for these funds This group could be constituted as a sub-committee of the SJTCC's Performance Based Accountability Committee
	Allowable Activities	<ul style="list-style-type: none"> Establish a workgroup of local (PICs and CWDs), state (EDD and DSS), and federal (DOL and HHS) partners to develop consistent definitions that will be acceptable statewide Ensure that the definitions are consistent with CalWORKs definitions to the extent possible
	Local Administrative Entity	<ul style="list-style-type: none"> Add a statement that accountability will be assigned through the existing Job Training Plan and subgrant process Recommend that the monitoring of WTW be conducted in conjunction with other monitoring, to the extent possible, to minimize disruption to the program operators
	Coordination	<ul style="list-style-type: none"> Add specific language requiring PICs and CWDs to develop referral protocols, including a description of how many clients in the target group will be referred to the PIC within specific time periods Urge state not to place additional requirements in the selection of systems for case management, assessment, or other activities Draft State Plan provides appropriate local discretion under I.A.6

SOURCE	ISSUE	COMMENTS
California Workforce Association	Coordination (Continued)	<ul style="list-style-type: none"> CWA should be added as a partner with the EDD and advisory bodies including the Department's SDA Administrators' Advisory Group and the CWDA to provide public forums for information sharing on successful practices and coordination efforts Future plan and policy development should be done in collaboration with the member of CWA, CWDA, and other state and local agencies charged with responsibility of these funds
	Discretionary Funds	<ul style="list-style-type: none"> Recommend that any proposal developed in response to the State for the use of the Governor's 15 percent funds must have the sign off, of the PIC, CWD, and Chief Local Elected Official in the area(s) to be served
	Local Signatures	<ul style="list-style-type: none"> Require PICs and CWDs to develop the plan through a collaborative process and eliminate the approval language as written
	Local Plans	<ul style="list-style-type: none"> Remove the language that refers to the State's consideration of a waiver when local official cannot reach agreement on the local plan Remove the language that requires approval of a local plan prior to the distribution of local funding Eliminate the joint resolution process from the local planning instructions
	Other Comments	<ul style="list-style-type: none"> Recommend that the State consult with local practitioners to develop a more realist schedule
Community Based Organizations	Performance Goals	<ul style="list-style-type: none"> Gain RFP originally had unrealistic performance goals, then became more flexible after public input Need more realistic performance goals because this is a whole new model, a work 1st model Should not use performance goals based on JTPA statistics 13 weeks will not work for refugees and immigrants Recommendations: Goals should be established along the lines of emerging PBA system Goals should be based on income needed to be self-sufficient Many CBOs who are in the Human Services Delivery System, but are separate and apart from PICs have much better placement records than the JTPA program
	Eligible Population	<ul style="list-style-type: none"> Many are homeless with multiple barriers; child care transportation, drug, psychological barriers (3) May not be same clientele as JTPA and will have particular needs (2) Plan does not adequately address the needs of the disabled population or special sub-population (2) Employability is problem due to lack of adequate child care and transportation JTPA program has been very difficult for refugee and immigrant populations to participate State needs to ensure innovative designs are developed to address a population not currently being served PICs don't know how to address this population that's why they don't have a plan
	Allowable Activities	<ul style="list-style-type: none"> Flexibility is important; need clearer definitions Provide transportation, child care, and training through community block grants Focus on work first not work in isolation. Need intensive support services prior to placement Provide job creation, economic development, and job training without public funds except for \$29,000 from county Would like to use WtW funds to develop pilot program

SOURCE	ISSUE	COMMENTS
Community Based Organization	Coordination	<ul style="list-style-type: none"> • Very concerned with collaboration in county and non duplicative services (2) • Needs stronger language detailing link between agencies • Client should also be a partner in collaboration • Partner agencies should work together • There is a gap between PICs and the providers • Human resource people of employer community need to be more involved • Concerned about PIC structure Recommendations: <ul style="list-style-type: none"> • CBOs should be included in collaborative process(2) • Propose state encourage use of "SWITP" model she has been using
	Local Administrative Entity	<ul style="list-style-type: none"> • While CBOs are best at intensive service delivery, they are less entrenched in the grant solicitation process • Do not want fund to flow from PIC; big struggle to get help through PIC Recommendations: <ul style="list-style-type: none"> • State should hold back some funding directly for CBOs to deliver services due to limited expertise in this area
	Local Plans	<ul style="list-style-type: none"> • Encourage state to ask PICs for local plans
	Other Comments	<ul style="list-style-type: none"> • Many people on SSI want to work and want to get off assistance • Success of these efforts depends on public and private collaboration; strong community partnership (2) • Confidentiality requirements regarding exchange of data not addressed Recommendations: <ul style="list-style-type: none"> • Suggest that the state continue to disseminate information on WtW activities throughout all three years because CBOs need to be kept informed • Suggest seminar or forums for employers to educate workforce prep entities on employer needs and for employer to become more familiar with WtW issues
Private Industry	Performance Goals	<ul style="list-style-type: none"> • Uncomfortable with performance goals • People in this population cannot be expected to behave same as dislocated workers Recommendations: <ul style="list-style-type: none"> • 40 percent would be better performance objective than 65 percent • 53 percent job retention rate has same problem; should be closer to 40 percent as well
	Eligible Population	<ul style="list-style-type: none"> • Much different population; barriers are much greater • Need to get people coming back to services they need
	Allowable Activities	<ul style="list-style-type: none"> • Plan focuses too much on placement rather than on other programmatic successes Recommendations: <ul style="list-style-type: none"> • Why not focus on other successes such as successful completion of drug & alcohol program or school curriculum, etc.
	Coordination	<ul style="list-style-type: none"> • Make system foster sense of community
	Other Comments	<ul style="list-style-type: none"> • Critical to match target population with appropriate jobs

SOURCE	ISSUE	COMMENTS
Legislature	General Comments	<ul style="list-style-type: none"> Looking at need for possible cleanup legislation Participating in process at many levels in community, particularly the one-stops Community feedback is important Should be a few bills addressing issue, including one authored by Aroner This is first time that economic developers and social workers have had to come together Huge paradigm shift
Labor	Performance Goals	<ul style="list-style-type: none"> Need flexibility and time between assessment/training and employment 65% performance goal is too high; competition for these jobs makes 65 percent not practical (2)
	Eligible Population	<ul style="list-style-type: none"> Carpenters apprenticeship already has extremely high rate of turnaround which helps neither employer nor persons being turnaround 80 percent of jobs are probably not available to this population This is population of people can't hold a job, have drug & alcohol problems, and/or are very undereducated This population needs tremendous support; can't expect them to stay in job without support
	Allowable Activities	<ul style="list-style-type: none"> We need flexibility to be innovative and creative The hire first, train later policy here is very difficult for us; this is turning current system upside down: work first, then get assistance. (2) We need your help in innovation; need flexibility Working on initiatives in construction and health care industries Labor is mentoring, peer counseling Should have more service recognition with options enabling individuals to lift themselves out of the welfare roles
	Coordination	<ul style="list-style-type: none"> Don't want labor to be seen as stopping block; organized labor wants to make WtW work (2) Urge you to provide the leadership & flexibility as well as the means to do it
Community Colleges	Performance Measures	<ul style="list-style-type: none"> Performance goals are inflexible; Please do not use JTPA guidelines or standards in establishing performance goals!!! If WtW eligible population mimics JTPA eligible population, then goals are unrealistic. Concerned with \$281 average weekly wage goal because most entry-level jobs available in Fresno for WtW clients are minimum wage. Entry level average wage of \$7 per hour is unrealistic Placement goals not likely to be achieved because area has limited job opportunities, mainly low paying service and agricultural jobs Establishment of 65 percent goal causes only selective clients to receive services People start to skew how they implement programs when standards are unrealistic. Resources are diverted to inefficient and temporary outcomes. <p>Recommendations:</p> <ul style="list-style-type: none"> 50 percent is more realistic placement rate

SOURCE	ISSUE	COMMENTS
Community Colleges	Allowable Activities	<ul style="list-style-type: none"> JTPA can't use temporary services Need relocation services to transport refugees where jobs are located in other parts of the country Don't have adequate transportation infrastructure; Public transportation is needed 24 hours to accommodate shift work Recommendations: <ul style="list-style-type: none"> Would like the development of a MIS to intersect existing parallel county data systems
	Coordination	<ul style="list-style-type: none"> Look closely at building staff capacity so efforts are coordinated; With improved staff capacity, employer contacts (job development) can be streamlined Recommendations: <ul style="list-style-type: none"> Would like EDD to take lead in capacity building and coordinating employer contacts; want more capacity building effort from the state Look at SJTCC to take the lead on capacity building
	Local Plans	<ul style="list-style-type: none"> Want to develop creative, locally based flexible program
	Other Comments	<ul style="list-style-type: none"> Employers just want service. They do not want to be bogged down with contracts and administrative tasks. Recommendations: <ul style="list-style-type: none"> Give TANF recipients priority for job placements Institutions with good placement track records should receive priority
County Welfare Departments	Performance Goals	<ul style="list-style-type: none"> Goals in state plan are unreasonable and inconsistent with CalWORKs. Align expectations and requirements with CalWORKs. (2) Goals are too high for participants entering this program. Performance requirements should not be imposed. PICs need to work as creatively as possible to get people to work Recommendation: <ul style="list-style-type: none"> EDD should establish Task Force for performance goals.
	Coordination	<ul style="list-style-type: none"> The state plan strengthens CWD collaboration with other agencies There is concern with local level collaboration and identifying duplicative services. CWDs traditionally have been reluctant to work with PICs because of JTPA performance requirements. Require accountability that duplication will not occur
	Local Plans	<ul style="list-style-type: none"> State plan and local planning guidelines more strongly encourage collaboration with CLEOs and CWDs and PICs. Need stronger language in the state plan to direct PICs to work with CWDs, especially in the area of service delivery to the WtW target population. Include CWD staff from the start in the PIC local planning development. Don't limit CWDs involvement to a sign-off only role CWD should not be excluded from sign-off process; handle like JTPA Training Plan which requires sign-off of the CWD and an open forum with the Board of Supervisors Plan should have review/approval by full county board of supervisors, not just sign off by board. WtW plan should be integrated into CalWORKs plan and not fragmented from county CALWORKS. (2) Recommendation: <ul style="list-style-type: none"> Local plan should be an addendum to county CalWORKs plan through public hearings. (2)

SOURCE	ISSUE	COMMENTS
County Welfare Departments	Discretionary Funds	<ul style="list-style-type: none"> Any projects funded by Governor's 15% funds have approval by PIC and CWD. State Plan should specify signatory requirements
County Welfare Directors Association	Performance Goals	<ul style="list-style-type: none"> Recommend that EDD establish a Task Force of affected stakeholders to better align its proposed performance standards for the WtW Program to those adopted by the Legislature for the CalWORKs program Goals in state plan are unreasonable and inconsistent with CalWORKs Align expectations and requirements with CalWORKs Goals are too high for participants entering this program
	Coordination	<ul style="list-style-type: none"> Recommend that both the State Plan and EDD's local planning guidelines more explicitly reinforce the notion of joint collaboration and planning between PICs and CWDs State Plan should more clearly and explicitly state that the local plan for implementing this program should be jointly developed and agreed to by the PIC and the CWD
	Discretionary Funds	<ul style="list-style-type: none"> Recommend that any project funded through the Governor's 15 percent set-aside have the approval of the affected PIC and CWD
	Local Plans	<ul style="list-style-type: none"> Recommend that local plans for implementation of WtW Grants be adopted by the County Board of Supervisors as an addendum to the county CalWORKs plans
California State Association of Counties	Matching Funds	<ul style="list-style-type: none"> Direct the State match to county welfare departments The State's administration needs should not be funded solely from the State match
	Performance Goals	<ul style="list-style-type: none"> Ensure that the performance measures for the WtW program mirror those for CalWORKs
	Local Plans	<ul style="list-style-type: none"> Integrate the local WtW plan into the county CalWORKs plans Require the local plan to be heard by the full County Board of Supervisors
Concerned Citizens	Eligible Population	<ul style="list-style-type: none"> WtW Population deserves same protections as CalWORKs population There is nothing in state plan that addresses disabled individuals; these individuals continue to be under employed Service providers continue to give the disabled low priority
	Allowable Activities	<ul style="list-style-type: none"> Important that state administrators understand accessibility issues for disabled; transportation and information should be accessible in all formats
	Coordination	<ul style="list-style-type: none"> How is the state going to address architectural and information accessibility issues in One stops and in coordination efforts
	Other Comments	<ul style="list-style-type: none"> Plan is silent on union representation, etc. Please send a clear message that we will consider affected persons have protections There is no interpretation of the American with Disabilities Act in the state WtW plan
City Government	Eligible Population	<ul style="list-style-type: none"> Biggest dilemma is transportation Vastness of Fresno County's geography creates a particular barrier
	Allowable Activities	<ul style="list-style-type: none"> Is transportation funding available through WtW? Clearer definitions
	Performance Goals	<ul style="list-style-type: none"> Should be higher for job retention

SOURCE	ISSUE	COMMENTS
	Coordination	<ul style="list-style-type: none"> • Have strong link to large, medium and small employers in place (2) • What is CalTrans role in WtW? • Important that WtW activities be coordinated with cities; partners including local govt. should work together so that all readily available services are utilized • Require accountability so that duplication will not occur • Interface with business community • Have better interaction with GAIN than with JTPA • Critical roles for MPOs in WtW • MPOs should provide forum for coordinating appropriate public and private agencies • MPOs should coordinate provision of transportation information for WtW clients
	Local Plans	<ul style="list-style-type: none"> • SCAG should be the link between jobs and transportation Recommendation: <ul style="list-style-type: none"> • Council should require PIC plans be submitted to MPOs to ensure transportation barriers are considered
	Other Comments	<ul style="list-style-type: none"> • Looking for technical assistance for programs currently in place • Create and expand services in one-stop centers; Need satellites closer to TANF recipients (2)
County Government	Administrative Cap	<ul style="list-style-type: none"> • Allocate full 15% administrative costs (2)
	Allowable Activities	<ul style="list-style-type: none"> • Need clearer definitions • Should allow more vocational education activities
	Eligible Population	<ul style="list-style-type: none"> • Would like to see more flexibility from state to use more moneys for other populations that could use these funds; such as mini grants • 70 percent set aside for persons on aid for 30 months is too restrictive
	Coordination	<ul style="list-style-type: none"> • Automatic designation of PIC as local administrative agency may result in local governmental fragmentation and duplication; need more flexibility
	Performance Goals	<ul style="list-style-type: none"> • Unrealistic and untenable due to different population group Recommendation: <ul style="list-style-type: none"> • Use SB 645 work